

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

344 PROVIDENCE ROAD REALTY
TRUST, RICHARD J. WUNSCHEL,
and NAUTILUS INSURANCE COMPANY,

Plaintiffs,

v.

AMERICAN SAFETY RISK RETENTION
GROUP, INC. and ARCHITECTURAL
DELEADING, INC.,

Defendants

CIVIL ACTION NO.: 04-40197-FDS

**JOINT MOTION OF THE PARTIES
TO EXTEND THE TIME FOR INITIAL DISCLOSURES**

The plaintiffs, 344 Providence Road Realty Trust, Richard Wunschel, and Nautilus Insurance Co., and the defendants, American Safety Risk Retention Group, Inc., and Architectural Deleading, Inc., hereby join together to request that this Court extend the deadline for completing initial disclosures under Federal Rule of Civil Procedure 26.1(a) to April 29, 2005.

As grounds for this motion, the parties state:

1. The parties are in the process of completing the necessary discovery, and require additional time to do so.
2. This is the first request for an extension of time and the parties do not request the extension of any other deadlines.
3. No party will be prejudiced by the delay and all parties agree to the extension.

WHEREFORE, for good cause shown and in the interests of justice and judicial economy, the parties respectfully request that the time for completing initial disclosures be extended to April 29, 2005.

ARCHITECTURAL DELEADING, INC.,
AS DEFENDANT AND NOT AS
DEFENDANT IN CROSS-CLAIM

By its attorneys:

MORRISON MAHONEY LLP

/s/ John F. Burke, Jr.

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The defendant,

AMERICAN SAFETY RISK RETENTION
GROUP, INC.

By its attorneys:

CLARK, HUNT & EMBRY

/s/ William J. Hunt

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The plaintiffs,

344 PROVIDENCE ROAD REALTY TRUST,
RICHARD WUNSCHER, and NAUTILUS
INSURANCE COMPANY

By their attorneys:

SMITH & DUGGAN LLP

/s/ Christina Schenk-Hargrove

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Dated: April 21, 2005

CERTIFICATE OF SERVICE

The undersigned certifies service of the foregoing on April 22, 2005, in accordance with Federal Rule of Civil Procedure 5(b)(2)(D) and United States District Court for the District of Massachusetts Electronic Case Filing Administrative Procedure § E(2) as all parties, having appeared in this action through counsel admitted to practice before this Court, have been identified by the Clerk as receiving Notice of Electronic Filing.

/s/ Christina Schenk-Hargrove
Christina Schenk-Hargrove (BBO No. 645164)